

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

SONDRA RAY, as the personal
representative of the estate of her son,
Steven Davis,

Plaintiff,

V.

RODERICK GADSON, et al.

Defendants.

CASE NO.: 2:20-cv-00499-RDP-GMB

JOINT MOTION TO SUBMIT

The parties jointly submit the proposed protective order filed contemporaneously herewith in response to the Court's instruction at the September 28, 2023 hearing (Doc. 188) and this Court's order (Doc. 196).

The parties have modified the Defendants’ proposed protective order to address the use of confidential documents and information in this litigation. Insofar as the proposed order addresses the use of documents and information in this litigation, the parties are in agreement with this proposed revised protective order, except for one objection as to one word in section 14 addressing “Independent Knowledge.” Plaintiff added this section, and the Defendants added the word “demonstrably” to clarify that the order does not limit any person’s ability to disclose information that the person “demonstrably” knows independently or from public records.

Plaintiff has not attempted to negotiate other provisions of the Defendants' proposed protective order, as Plaintiff did not understand that to be part of the Court's instructions. Plaintiff has other concerns regarding the order, including those stated in pleadings and at the hearing. By submitting this order, Plaintiff is not withdrawing or waiving any objections. Likewise, the Defendants do not waive their arguments and positions during the hearing.

Respectfully submitted,

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